

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEREK KHANNA, individually and derivatively)
on behalf of Shimbly Corporation,)
)
Plaintiff,)
) Case No. 21-cv-5752
v.)
) Hon. Judge Virginia M. Kendall
)
KATELYNN BANKS, *et al.*,) Magistrate Judge Keri Holleb Hotaling
)
Defendants.)
)

JOINT STATUS REPORT

Pursuant to the Court’s June 16, 2025 Order (Doc. No. 337), Plaintiff Derek Khanna, individually and derivatively on behalf of Shimbly Corporation (“Plaintiff”), and Defendants Katelynn Banks and (“Banks”), Nominal Defendant Shimbly Corporation (“Shimbly”), (collectively, “Defendants”) (Plaintiff and Defendants are collectively referred to herein as “Parties”), by their respective undersigned attorneys, and for their Joint Status Report, state as follows:

1. The current deadline for completion of fact discovery was October 31, 2025.
2. Counsel for the above parties have conferred regarding outstanding written discovery and anticipate resolving those issues without court involvement.
3. Counsel for the parties conferred regarding the Court’s recent Order on Defendants’ Motion to Dismiss (Dkt#339), and settlement negotiations are ongoing.

4. Judge Kendall has set the date for filing dispositive motions as 1/30/2026, with responses due by 2/27/2026, and replies due by 3/13/2026.
5. The parties propose the following expert discovery schedule: Plaintiff to disclose his experts by December 15, 2025. The plaintiff's experts to be deposed by January 20, 2025. The defendant does not anticipate disclosing any experts.

Dated: November 3, 2025

PLAINTIFF DEREK KHANNA

DEFENDANT KATELYNN BANKS
DEFENDANT SHIMBLY CORPORATION

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